

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V., and SGO
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-WMW-JFD

**DECLARATION OF MICHAEL E. BLOOM IN SUPPORT OF SMARTMATIC'S
OPPOSITION TO DEFENDANTS' MOTION TO COMPEL**

I, Michael E. Bloom, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over the age of 18, I am competent to make this declaration, and I have personal knowledge of the facts stated herein. These facts are true to the best of my knowledge, information, and belief, and if called upon to testify as a witness, I could and would testify competently to them.

2. I am a partner at the law firm Benesch, Friedlander, Coplan & Aronoff, LLP, and I represent Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited ("Smartmatic") in the above-captioned lawsuit.

3. Attached as Exhibit 1 is a true and correct copy of the Contract by and between County Of Los Angeles and Smartmatic USA Corporation for Voting Solutions for All People (VSAP) Implementation And Support Services.

4. Attached as Exhibit 2 is a true and correct copy of SLI Compliance's report titled, "County of Los Angeles' VSAP Tally 2.1 Software Test Report for California."

5. Attached as Exhibit 3 is a true and correct copy of SLI Compliance's report titled. "Los Angeles County VSAP Tally 2.1 Security and Telecommunications Test Report for California Secretary of State."

6. Attached as Exhibit 4 is a true and correct copy of the California Secretary of State's ("SOS") Conditional Approval of Los Angeles County's Voting Solutions for All People (VSAP) 2.1 Voting System.

7. Attached as Exhibit 5 is a true and correct copy of the California SOS's Administrative Approval of Los Angeles County's VSAP 2.2 voting system.

8. Attached as Exhibit 6 is a true and correct copy of the Notice of Subpoena to Los Angeles County that Defendants served on Smartmatic on February 7, 2023.

9. Attached as Exhibit 7 is a true and correct copy of the Notice of Subpoena to the California SOS that Defendants served on Smartmatic on February 7, 2023.

10. Attached as Exhibit 8 is a true and correct copy of the Declaration of Michael D. Owens in Support of County of Los Angeles's Emergency Motion to Continue Hearing and for Leave to Oppose Motion, filed in *Election Systems & Software, LLC v. Smartmatic USA, Corp.*, No. 18-cv-01259 (D. Del.) (ECF No. 93).

11. Attached as Exhibit 9 is a true and correct copy of the report published by the Los Angeles County Registrar-Recorder/County Clerk titled, "Voting Solutions For All People Final Report."

12. Attached as Exhibit 10 is a true and correct copy of a webpage published by the Los Angeles County Registrar-Recorder/County Clerk titled, “BMD Ballot Security.”

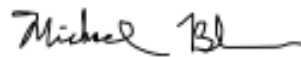
13. Attached as Exhibit 11 is a true and correct copy of the report published by Los Angeles County Registrar-Recorder/County Clerk titled, “Voting Solutions for All People Use Procedures.”

14. Attached as Exhibit 12 is a true and correct copy of the report published by the California SOS titled, “Supplement to the Statement of Vote, November 3, 2020 General Election Statewide Summary by County for President.”

15. Attached as Exhibit 13 is a true and correct copy of the voting results by County for the 2016 Presidential Election, published by the California Secretary of State.

16. I informed representatives of Los Angeles County of the discovery requests at issue in Defendants’ Motion to Compel, and they informed me that Los Angeles County would not make any potentially responsive materials available to Smartmatic for the purpose of production to Defendants in this lawsuit.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Michael E. Bloom

Executed on February 16, 2023.